

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

TUAN TRAN AND THOMAS DESHAIES,

Plaintiffs,

v.

THE ROMAN CATHOLIC DIOCESE OF
SPRINGFIELD, a corporation sole,

Defendant.

Civil Action No.: 05-30085-MAP

JOINT MOTION FOR STAY

The plaintiffs, Tuan Tran and Thomas Deshaies (collectively "Plaintiffs"), and the defendant, The Roman Catholic Diocese of Springfield ("Defendant"), hereby move this Court to: (a) stay the above-entitled action; and (b) schedule a status conference on February 1, 2006 or a date soon thereafter convenient to the Court.

In support of their motion to stay, the parties state as follows:

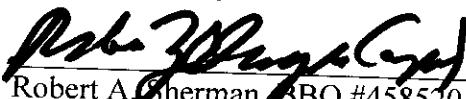
1. The above-entitled action was filed on April 12, 2005, and involves Plaintiffs' claims against the Defendant for vicarious liability based on alleged sexual abuse suffered at the hand of Bishop Thomas L. Dupre.

2. On September 23, 2005, the Court convened a hearing on Defendant's Motion to Dismiss. At the close of the hearing, Magistrate Judge Kenneth P. Neiman indicated that he was inclined to recommend a stay in light of a pending state court proceeding involving some common issues. Judge Neiman suggested that the parties were free to negotiate a stipulated resolution on the spot.

3. The parties conferred and were in agreement that a stay was appropriate at this time¹.

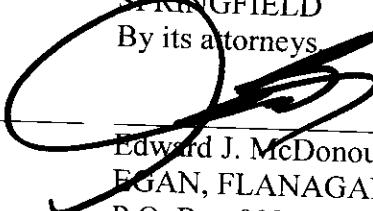
WHEREFORE, for the foregoing reasons, and in the interests of settlement and avoiding potentially unnecessary litigation costs, the Plaintiffs and the Defendant respectfully move this Court for: (a) a stay of this case; and (b) a status conference on February 1, 2006 or a date soon thereafter convenient to the Court. A proposed order is appended.

TUAN TRAN and
THOMAS DESHAIES
By their attorneys,

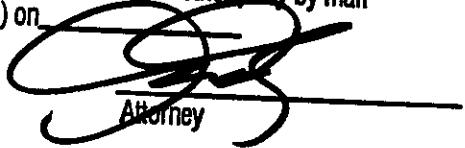

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Dated: October 4, 2005

THE ROMAN CATHOLIC DIOCESE OF
SPRINGFIELD
By its attorneys


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I certify that a true copy of the above document was served upon (each party appearing pro se and) the attorney of record for each other party by mail (by hand) on


Attorney

¹ The parties recognize that either side would have a right to move to vacate the stay under appropriate circumstances.